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***Attorneys for Plaintiffs***

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

PETER DELVECCHIA, <i>et al.</i> ,	)	<b>Case No: 2:19-CV-01322-KJD-DJA</b>
	)	
Plaintiffs,	)	
	)	<b>PLAINTIFFS' THIRD MOTION</b>
	)	<b>FOR LEAVE TO FILE EXHIBIT</b>
vs.	)	<b>UNDER SEAL</b>
	)	
	)	<b>LR IA 10-5</b>
FRONTIER AIRLINES, INC., <i>et al.</i> ,	)	
Defendants.	)	
	)	

Plaintiffs, Peter DelVecchia individually and as next friend of A. D., a minor, by counsel, hereby move pursuant to Local Rule IA 10-5(a) for leave to file Exhibit A to their Supplemental Motion for Sanctions (ECF No. 141), consisting of certain redacted Frontier incident reports of suspected human trafficking and/or sex trafficking, and complaints by other Frontier passengers of racial discrimination, and some additional records, under seal. The sole reason for Plaintiffs seeking leave to file the documents under seal is that Frontier produced them stamped “**CONFIDENTIAL**”

**PLAINTIFFS' THIRD MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

1 **SUBJECT TO PROTECTIVE ORDER**” indicating designation under the Protective Order entered in  
2 this action on October 10, 2019 (ECF No. 37). That Order does not specifically authorize the filing of  
3 any document under seal. Plaintiffs do not believe that the documents contain “confidential  
4 information” worthy of protection under that Order, and hereby give notice of their position to  
5 Defendants pursuant to Paragraph 3 of that Order. For the present time, however, this Motion is filed  
6 pursuant to LR IA 10-5.  
7

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9 DATED this 2<sup>nd</sup> day of November, 2021.

10  
11 /s/ John D. McKay  
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24 *Attorneys for Plaintiffs Peter DelVecchia*  
25 *And A.D., a Minor*  
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